

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA )  
 )  
 v. ) CRIMINAL NO. 13-10200-GAO  
 )  
 DZHOKHAR TSARNAEV )

**MOTION FOR EXTENSION OF TIME IN WHICH TO FILE REPLY**

Defendant, Dzhokhar Tsarnaev, by and through counsel, respectfully requests an extension of time, through and including October 30, 2015, in which to file a reply to the government's Opposition [DE 1542] to his Motion for Judgment Notwithstanding Verdict and for New Trial [DE 1490]. The government has stated that it takes no position on the defense request for additional time.

As grounds for this motion, the defense states that the Opposition included a number of factual assertions and assumptions about the technical workings of Facebook, some of which are beyond the personal knowledge of counsel, that require time to investigate and research. In addition, the legal issues, specifically including those surrounding the recent Supreme Court decision in *Johnson*, are novel and complex and require additional time to address as this area of the law is developing and changing rapidly.

Respectfully submitted,

DZHOKHAR TSARNAEV  
by his attorneys

/s/ William W. Fick

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**Certificate of Service**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on October 9, 2015.

/s/ William Fick